

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Reinheart Johnson,

Civil File No: 06-CV-2267 (MJD/SRN)

Plaintiff,

vs.

Welsh Equipment, Inc.,
Dickie Equipment Co., Inc.,
and Parrish Tire Company,

**STIPULATION OF THE
PARTIES TO AMEND
PLEADINGS TO JOIN
ADDITIONAL PARTIES**

Defendants.

COMES NOW the parties and hereby jointly move the Court for an Order granting Plaintiff leave to amend the Complaint to add additional parties and allowing Defendants to plead in response to the Amended Complaint in accordance with the provisions of the Federal Rules of Civil Procedure.

Accordingly, the parties hereby stipulate to the following:

1. The parties have participated in meaningful preliminary discovery in this matter, including the depositions of seven (7) individuals who either held a prior ownership interest in the subject vehicle or were in some manner involved in the use, inspection, or repair of the subject vehicle or subject tire.

2. Through the course of this discovery, it has become apparent that the addition of several parties will be necessary in order to most efficiently litigate this matter.

3. Counsel for the respective parties have reviewed the attached proposed Amended Complaint and stipulate to the filing of same, subject to the Court granting leave to do so.

4. Counsel for Defendants Welsh Equipment, Inc., Dickie Equipment Co., Inc., and Parrish Tire Company each further acknowledge their authority to accept service of the Amended Complaint on behalf of their respective client through the electronic filing system and that personal service of same upon those Defendants shall be waived.

THEREFORE, the parties respectfully request that this Court enter an Order as follows:

1. Granting Plaintiff leave to file the attached proposed Amended Complaint.
2. Ordering that service of the Amended Complaint upon Defendants Welsh Equipment, Inc., Dickie Equipment Co., Inc., and Parrish Tire Company shall be deemed sufficient once Plaintiff has caused the Amended Complaint to be filed electronically with the Clerk of Court through ECF, and ECF has sent an e-mail notice of the electronic filing to all counsel currently of record.
3. Granting Defendants leave to plead in response to the Amended Complaint in accordance with the provisions of the Federal Rules of Civil Procedure.

HARPER & PETERSON, P.L.L.C.

Dated: February 28, 2007

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Dated: February 28, 2007

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Dated: February 28, 2007

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This signature page is part of the Stipulation of the Parties to Amend
Pleadings to Join Additional Parties in Case No. 06-CV-2267 MJD/SRN,
Reinheart Johnson vs. Welsh Equipment, Inc., Dickie
Equipment Co., Inc., and Parrish Tire Company

OPPENHEIMER, WOLFF &
DONNELLY, L.L.P.

Dated: February 28, 2007

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